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EXPERIAN INFORMATION SOLUTIONS,
INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AKRAM CHAHIN and JACKELYN
YOU,

Plaintiffs,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC.; DOES 1-10
inclusive

Defendants.

Case No. 8:17-cv-00093

[Removal of Orange County Superior
Court, Case No. 30-2016-00893243-
CL-NP-CJC]

**NOTICE OR REMOVAL OF
ACTION PURSUANT TO
28 U.S.C. § 1441**

**[FEDERAL QUESTION
JURISDICTION]**

Complaint filed: December 19, 2016

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1441 *et seq.*,
Defendant Experian Information Solutions, Inc. (“Experian”) hereby files this
Notice of Removal of the above-captioned action to this Court and states as
follows:

1. Experian is the only named Defendant in Civil Action No. 30-2016-
00893243-CL-NP-CJC filed by Plaintiffs Akram Chahin and Jackelyn You
(together, “Plaintiffs”) in the Superior Court of the State of California, County of
Orange (the “State Court Action”).

1 2. The Complaint in the State Court Action was filed with the Clerk of
2 the Superior Court of the State of California, County of Orange, on December 19,
3 2016. Plaintiffs served Experian with the Summons and Complaint in the State
4 Court Action on December 20, 2016.

5 3. This Notice is being filed with this Court within thirty (30) days after
6 Experian received a copy of Plaintiffs' initial pleading setting forth the claims for
7 relief upon which Plaintiff's action is based.

8 4. This Court is the proper district court for removal because the State
9 Court Action is pending within this district.

10 5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and
11 orders served upon Experian in the State Court Action is attached hereto as
12 **Exhibit A**. The attached documents are the only pleadings currently on the docket
13 in the State Court Action.

14 6. Experian is a corporation which, for monetary fees, regularly engages
15 in whole or in part in the practice of assembling consumer credit information or
16 other information on consumers for the purpose of furnishing consumer reports to
17 third parties. Experian uses means or facilities of interstate commerce for the
18 purpose of preparing or furnishing consumer reports, and therefore is a "consumer
19 reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

20 7. The claims for relief against Experian alleged in the State Court Action
21 arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this
22 Court has original subject matter jurisdiction over the above-captioned action
23 pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action
24 may properly be removed to this United States District Court pursuant to 28 U.S.C.
25 § 1441(a).

26 8. This Court also has supplemental jurisdiction over Plaintiffs' state law
27 claim under California Civil Code § 1785.1 *et seq.*, because the state law claim is so
28 related to Plaintiffs' federal question claims that they form part of the same case or

1 controversy pursuant to 28 U.S.C. § 1367(a).

2 9. Promptly after the filing of this Notice of Removal, Defendant shall
3 provide notice of the removal to Plaintiffs through their attorney of record in the
4 State Court Action, and shall file a copy of this Notice with the clerk of the Court in
5 the State Court Action, as required by 28 U.S.C. § 1446(d).

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7 Dated: January 19, 2017

JONES DAY

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9 By: /s/ Jennifer Sun
10 Jennifer Sun

11 Attorneys for Defendant
12 EXPERIAN INFORMATION
13 SOLUTIONS, INC.
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